MM Docket 99-325 NRSC-5 COMMENTS (filed as individual)

I am writing as a concerned and avid AM listener about what I see as the deleterious effects of the proposed NRSC-5 standards for HD radio. I am an owner of numerous kinds of AM receivers, some wide band, some narrow band, including a host of antique and classic receivers from the 1920s to the present.

More important, I live in the greater Philadelphia area, with reception of Philadelphia, Trenton and New York City radio stations, a very congested situation indeed.

Thus what concerns me is the prospect of first and second-adjacent interference from the IBOC signal. Some examples are as follows:

I am a regular listener to WCHR (AM), Flemington, NJ at 1040 kHz where according to radio-locator.com, I'm in that stations 2.5 mv coverage area. I already get some adjacent channel interference from WEPN, New York at 1050 kHz, but this is minor. What will happen if WEPN goes IBOC with the steady and louder noise produced by the IBOC signal? The same thing is true when I try to listen to Levittown-Fairless Hills based WBCB 1490. WDAS (AM), Philadelphia is now broadcasting IBOC and cuts into WBCB's Northeast Philadelphia coverage area. I use to listen to AM 620, WSNR, Jersey City, NJ with my GE Superadio III, but I can't anymore. WIP 610 is IBOC and the IBOC noise makes that impossible!

Another concern I have is the reduction of audio bandwidth to 5 kHz. Despite what is commonly assumed, I can hear a difference as to whether the bandwidth is 5 or 10 kHz on many of my receivers, both wide and narrow band. I can tell for example when WPEN, Philadelphia, an oldies station is broadcasting IBOC and when it is not because the frequency response changes and I can even hear the difference on an old Bradford AM/FM/Shortwave radio that obviously was not designed as a wide band radio. In addition, when I do listen to a wide band radio such as my Cambridge Soundworks model 88 table radio, I not only can hear the lack of bandwidth but I can hear the IBOC noise along with the analog signal, rendering the reception of those stations useless.

Finally, there's the issue of a lack of a codec standard. Ibiquity committed itself to an open standards policy and now it's keeping its codec secret. Will the HD radio I buy today work in the future? Will Ibiquity have a monopoly on digital radio and therefore maintain control over the price of transmitting and receiving equipment?

I haven't even begun to address the disaster that could occur if AM IBOC was granted nighttime authority.

In conclusion, I feel there's a lot more real world independent testing to be done before such a system is implimented. There need be no rush for AM DAB. Let's not destroy the Standard Broadcast Band.

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